

Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th Street SW
Washington, DC 20554

Petition for Exemption from Closed Captioning Requirements

Introduction

Rivertown Ford is a new and used car dealership in Columbus that strives to sell affordable and reliable vehicles in our community.

Our half hour program features offers that will only last a short time. The program shows vehicles in detail with prices.

The program is only 30 minutes long and airs between 3 and 12 times per week. The program airs on FOX and possibly other affiliates soon. FOX produced the show, and this program was produced for the first time last week. It hasn't started running yet; therefore we don't know yet how often we will produce new shows.

For the reasons set forth below, Rivertown Ford requests an undue burden exemption from the closed captioning rules for Rivertown Ford January 2006, pursuant to § 79.1(f) of the Commission's rules.

Nature and Cost of Closed Captions

The FOX rep quoted an out of state production cost of \$337.00. The time sensitivity is the factor here, because there is no service provided locally.

Impact on the Operation of the Program Provider

Our cost for this is minimal as possible. We use our employees and family for on-air talent. These people are not compensated from Rivertown Ford. Also our FOX rep handles all production. Closed Caption would increase the cost of each commercial production by \$337.00. The impact that closed captioning would have on us in the two weeks it would take to get this completed is huge. The consumers would think we were advertising with false pretense because by the time we received the tape back those same vehicles may or may not still be available. Which would in turn cost the company money because we would have spent money that is not profitable, not to mention our staffs wasted time and effort.

Financial Resources of the Program Provider

The company is not under financial burden; this is simply a time sensitive issue. There is no one in our market that offers closed captioning service. The out of state production my FOX rep quoted is a two week turn around.

Type of Operations of the Program Provider

We are a locally owned Ford dealership that strives to provide consumers with quality, dependable and low priced vehicles.

Other factors

Petitioner believes that the local, non-news exemption to the closed captioning rules also applies to Rivertown Ford 30 minute "January 2006". As noted above, the program is produced and distributed locally, and is primarily local public interest. The episodes are not news, they do not have repeat value, (the vehicles will be sold), and the electronic newsroom technique is not available. Notwithstanding the applicability of the exemption, we have filed this petition in an abundance of caution and for the purpose of establishing certainty.

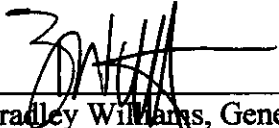
Conclusion

As shown by this Petition and its attachments, the Commission should grant a waiver of the closed captioning requirements in this case, because requiring closed captioning would create an undue burden. The costs of captioning would be excessively high and would have a significant impact on Petitioner's operations. The Petitioner's type of operations and financial resources are different in kind and magnitude from a mainstream programming provider. Because of the significant difficulty and expense of providing closed captions, a waiver under § 79.1(f) is warranted. If more information is needed, please contact me at the address provided below.

Respectfully submitted,

Rivertown Ford, Inc.

By:



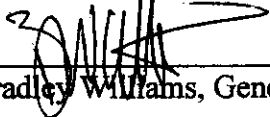
Bradley Williams, General Manager
1680 Whittlesey Rd.
Columbus, Georgia 31904
(706) 653-7420
(706) 653-1267

Dated: January 12, 2006

Exhibits checklist:

1. Declaration:

I, Bradley Williams, am General Manager of Rivertown Ford, and I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of Rivertown Ford in this matter, and, upon information and belief, believe the statements regarding our organization and Rivertown Ford "January 2006" to be true and accurate.



Bradley Williams, General Manager

January 12, 2006

2. Schedule

See attachment

3. Other

See attachment

DC: 1984544-1



JANUARY 2006
 HALF HOUR INFOMERCIAL SCHEDULE FOR RIVERTOWN FORD

SUNDAY	MONDAY	TUESDAY	WEDNESDA	THURSDAY	FRIDAY	SATURDA
1	2	3	4	5	6	7
8	9	10	11	12	13 1:30-2PM 1-1:30AM	14 5-5:30AM
15 6:30-7AM 8:30-9AM 10:30-11AM	16	17 6-6:30AM	18 6:30-7AM 1:30-2PM	19 8:30-9AM 1:30-2PM	20 1:30-2PM 1-1:30AM	21 5-5:30AM 12-12:30PM
22 6:30-7AM 8:30-9AM 10:30-11AM	23	24 6-6:30AM	25 6:30-7AM 1:30-2PM	26 8:30-9AM 1:30-2PM	27	28 12-12:30PM
29 8:30-9AM	30	31				



Closed Captioning Services - 2006

Your internal post production facility, Raycom Post, can help your station with all of your closed captioning needs. The below pricing is based on a 30 minute post produced program. Pricing for additional run times and tape formats are available. Real time (live) closed captioning services can be quoted as well and will be based on program length and periods covered. Please contact us for those rates.

- **Offline Captioning:** Transcribing of the actual verbatim program content in preparation for closed captioning encoding (shown below). Price includes (1) VHS work tape which is required for transcribing: **\$272.00**
- **Closed Captioning Encoding:** Making use of the verbatim transcription file prepared above, this fee is for the actual CC encoding on line 21 of your master and will be in addition to the basic duplication rates. **\$30.00**
- **Duplication to Betacam SP or DVC Pro: \$35.00**
- **Duplication to Digital Betacam: \$60.00**
- **Live Real Time Captioning:** *Please call for these rates. Pricing is based on the volume of live programming captioned.
- **Video Descriptive Services:** (aural description of screen content for the visually impaired): Call for rates.
- **Spanish and Multilingual captioning:** Call for rates.

Example: To create a 30 minute offline closed captioned DVC Pro master, it would cost **\$337.00**.

Raycom Post Production – 4450 Lakeside Dr. # 300 - Burbank, CA 91505
818-846-0101 – 818-846-0277 – www.raycompost.com